

MARYLAND DEPARTMENT OF THE ENVIRONMENT

Oil Control Program, Suite 620, 1800 Washington Blvd., Baltimore MD 21230-1719
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Deputy Secretary

June 9, 2005

CERTIFIED MAIL

Mr. Jack Almony
Fallston Service Center
602 Fallston Road
Fallston MD 21047

RE: FURTHER INVESTIGATION REQUIREMENT

Notice of Violation NV-2005-007

Case No. 9-0816-HA

Fallston Service Center

602 Fallston Road

Fallston, Maryland

Facility I.D. No. 0009047

Dear Mr. Almony:

The Oil Control Program recently completed a review of the *Well Installation and Groundwater Sampling Report - April 29, 2005* prepared by ATC Associates, Inc. for the above-referenced property, located in Harford County. Four additional groundwater monitoring wells were installed at this site and groundwater samples were collected and analyzed for volatile organic compounds (VOCs). The sample results indicate the following petroleum constituents in monitoring well MW-6, located adjacent to the active underground storage tank field at Fallston Service Center:

- Benzene at 1,150 parts per billion (ppb);
- Toluene at 889 ppb;
- Ethylbenzene at 750 ppb;
- Xylene at 3,720 ppb; and
- Methyl tertiary-butyl ether (MTBE) at 19,400 ppb.

MTBE at 548 ppb was also detected in monitoring well MW-9, located adjacent to the property border shared with the Fallston Presbyterian Church.

Based on the confirmed presence of petroleum constituents in the groundwater at this site, the Department hereby requires the following activities be completed:

- (1) Conditions must be evaluated in the vicinity of the tank field to determine how vapor and/or liquid releases have impacted the local groundwater. The shallow hand-dug monitoring pipes (MW-2 and MW-3) must be properly abandoned and replaced with properly constructed monitoring wells suitable for groundwater recovery. Soil samples must be collected from each newly installed well from at least every five-foot interval and at the soil/groundwater interface. These grab soil samples must be submitted to a fixed laboratory for the analysis of full-suite VOCs, including all fuel oxygenates, using EPA Method 8260 and for total petroleum hydrocarbons/diesel and gasoline-range organics (TPH/DRO and TPH/GRO) using EPA Method 8015B. If soils are field screened using a photo-ionization detector (PID) and elevated readings are recorded, a grab sample must be collected at the corresponding depth in addition to those collected at five-foot intervals and the soil/groundwater interface.
- (2) Evaluate the hydrogeologic and geologic on-site and off-site conditions based on all previous environmental site assessments and supplemental field activities conducted to date, including the installation of at least two nested pairs of monitoring wells to fully delineate the potential cross communication between the shallow and deeper groundwater flow regimes. These nested wells must be installed:
 - A. In the vicinity of MW-6 between the active tank field and the on-site production well; and
 - B. In the vicinity of MW-9 between the non-community supply well at the Fallston Presbyterian Church and the active tank field at Fallston Service Center.

Care must be exercised to fully maintain separation between the shallow and deeper aquifer zones by the utilization of proper installation and construction of nested monitoring wells that fully seal off each zone. Please provide the Department with a summary of how this work will be completed prior to the installation of these nested wells.
- (3) Provide all groundwater sampling results; boring logs annotated with field screening results and lithologic descriptions; the results of any field geophysical investigations and well surveys; fracture trace analysis; illustrative maps showing groundwater interpretations (e.g. groundwater contour maps, cross-sections of geologic and hydrogeologic conditions); and other pertinent qualitative and/or quantitative discussions.
- (4) Please note that information concerning the non-community supply well at Fallston Presbyterian Church may be obtained from the Harford County Health Department.
- (5) Please include a schedule for completing all field activities. Quality assurance and quality control measures must be implemented during field activities and sample collection. Results must be monitored, evaluated, and reported in accordance with the Department's Maryland Environmental Assessment Technology (MEAT) for Leaking Underground Storage Tanks guidance document, which may be accessed at:

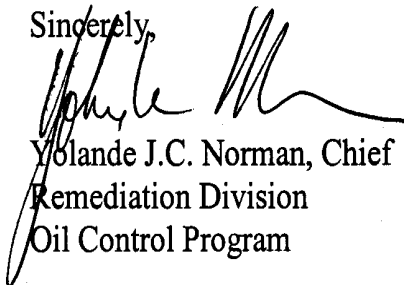
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- (6) No later than August 1, 2005, all supplemental information generated by additional on-site field activities, including but not limited to: raw analytical data; scaled site maps; groundwater contoured maps; site-specific detailed hydrogeology (e.g. groundwater flow, hydraulic conductivity); and qualitative and/or quantitative discussions must be submitted to the Oil Control Program for our review. As part of this submittal, all data generated must be fully evaluated and the results fully discussed with the aim of determining the most feasible means of corrective action for this site.

Based on the results of the above activities, the Department reserves the right to require further investigation on-site and off-site to ensure that contaminant levels do not pose a further threat to public health and the environment. The information generated from this subsurface investigation will be reviewed to determine if further action will be required.

Failure to comply with the Department's directives and timeline will result in additional enforcement proceedings that could include the issuance of civil penalties and other legal sanctions. If you have any questions, please contact the case manager, Mr. Ken Carter, at 410-537-3670 (kcarter@mde.state.md.us) or the regional supervisor, Ms. Susan Bull, at 410-537-3499 (sbull@mde.state.md.us).

Sincerely,



Yolande J.C. Norman, Chief
Remediation Division
Oil Control Program

SRB/nln

cc: Mr. Shawn Seaman (ATC Associates, Inc.)
Ms. Susan Lloyd (Fallston Pre-Kindergarten School)
Reverend Mitch Miller (Fallston Presbyterian Church)
Ms. Susan Kelly (Harford County Health Department)
Mr. Barry O'Brien (MDE-Water Supply Program)
Mr. Herbert Meade
Mr. Horacio Tablada